

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

GETTY IMAGES (US), INC.,  
Plaintiff,  
v.  
MICROSOFT CORPORATION,  
Defendant.

NO. 14-CV-7114-DLC

**ORAL ARGUMENT REQUESTED**

**PLAINTIFF'S NOTICE OF MOTION AND  
MOTION FOR PARTIAL SUMMARY JUDGMENT ON LIABILITY**

PLEASE TAKE NOTICE that pursuant to Rule 56 of the Federal Rules of Civil Procedure, Plaintiff Getty Images (US), Inc. hereby moves this Court, before the Honorable Denise L. Cote, United States District Judge for the Southern District of New York, 500 Pearl Street, New York, New York 10007, for an order granting Plaintiff partial summary judgment as to Defendant's liability for copyright infringement.

As grounds for and in support of this Motion, Plaintiff relies on and incorporates fully herein: (i) the accompanying Memorandum of Law; (ii) the accompanying Statement of Undisputed Material Facts Pursuant to Local Civil Rule 56.1 and exhibits thereto; (iii) the accompanying Declaration of Leah Kyle; and (iv) all other papers, declarations, and exhibits thereto previously filed with the Court in conjunction with Plaintiff's motion for a preliminary injunction and Defendant's motion to dismiss.

Dated: January 16, 2015

Respectfully submitted,

/s/ Kenneth L. Doroshow  
Kenneth L. Doroshow (KD-8374)  
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*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on January 16, 2015, I caused the foregoing notice of motion and accompanying documents to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

Executed: January 16, 2015

/s/ Kenneth L. Doroshow  
Kenneth L. Doroshow (KD-8374)